

1 I, Bryan Petersen, hereby declare:

2 1. I am a United States citizen, and I am twenty-five years old.

3 2. In approximately 2011, I met Ryan Michael Spencer through the internet site
4 Trevorspace.org, an online social networking community for LGBTQ youth.

5 3. In approximately 2013, Spencer and I began exchanging child pornography, primarily via
6 Gmail and the iPhone application Kik Messenger. Initially, Spencer and I exchanged child pornography
7 obtained from the internet. In time, however, Spencer and I also began exchanging sexually explicit
8 photographs that we produced by using our phones to surreptitiously photograph the genitalia and/or
9 pubic areas of some of the children with whom we each came into contact through our jobs.

10 4. Spencer explained to me that he would surreptitiously take photographs of children by
11 holding his phone to his body such that no one could see the screen. He would then press the volume
12 buttons to take a photograph.

13 5. Spencer told me that he had also installed an application on his iPhone that made the
14 phone's screen go black, as if it were off, while still allowing him to take photographs. Spencer
15 recommended that I download a similar application in order to take photographs using this method.

16 6. On several occasions, Spencer boasted to me that he had molested some of the children
17 he babysat. Spencer told me that one of those children, whom I will call Juvenile Victim 1, had autism
18 and was often under the influence of medication that would prevent him/her from awakening when
19 touched.

20 7. On at least two occasions, Spencer sent me photographs that showed him molesting
21 Juvenile Victim 1 under the child's bed sheets.

22 8. Spencer told me that, after taking sexually explicit photographs of children, he would
23 move the images from his phone's camera roll to an iPhone application that password-protected them.
24 He explained that, from time to time, as the storage space on his phone filled up, he would move the
25 photos from the password-protected application on his iPhone to an external hard drive, which he had
26 encrypted.

27 9. Spencer also told me that his laptop had an encrypted partition in which he stored child
28 pornography. Spencer told me that he brought the laptop with him to school and that, on one occasion,

1 he inadvertently almost projected child pornography in a classroom.

2 10. In approximately January 2016, Spencer told me that he wanted to purchase a new
3 external hard drive for his collection of child pornography, which he said was very large. Around the
4 same time, Spencer told me that his collection of child pornography was stored on numerous devices,
5 including an encrypted part of his laptop, at least one external hard drive, and his phone.

6 11. In approximately February 2016, Spencer told me that, if I sent him an external hard
7 drive, he would load it with child pornography and encrypt the drive for me.

8 12. In approximately March 2016, Spencer told me that he had bought a new external hard
9 drive and was working on transferring his collection of child pornography from various devices to the
10 new hard drive. Spencer again told me that, if I sent him a hard drive, he could fill it with child
11 pornography and encrypt it for me.

12 13. Shortly thereafter, I told Spencer that I was sending him a Transcend Military Drop
13 Tested 1 TB external hard drive, which I had purchased on Amazon.com. Spencer told me that,
14 coincidentally, he had exactly the same make and model of external hard drive, which was the hard
15 drive to which he was transferring his collection of child pornography.

16 14. In the fall of 2016, I traveled to Aptos, California, to meet with Spencer in person and to
17 retrieve the hard drive that he had filled with child pornography for me. During that visit, Spencer gave
18 me the hard drive he had prepared for me and showed me that he had encrypted it using VeraCrypt.
19 Spencer had written down the encryption password on a post-it note, and he showed me how to access
20 the encrypted files. The encryption password that Spencer had created for me incorporated the name of
21 one of the children I had previously babysat. Spencer then gave the post-it note to me and instructed me
22 to memorize the password and destroy the post-it note.

23 15. During the same visit, I watched as Spencer plugged his iPhone and the Transcend
24 external hard drive into a black laptop. Spencer commented to me that he was transferring files from his
25 iPhone.

26 16. During the same visit, I saw Spencer plug his Transcend 1 TB external hard drive into a
27 black laptop and type in his encryption password from memory so that we could view child pornography
28 stored on the external hard drive. I could tell from the screen on which Spencer entered his encryption

1 password that his external hard drive, like the one he had given to me, had been encrypted using
2 VeraCrypt. I distinctly remember seeing Spencer enter the encryption password from memory, because
3 I recall watching his fingers as he typed and noticing that the encryption password appeared to
4 incorporate the first name of a boy for whom Spencer claimed to have feelings, as well as a sequence of
5 numbers. I watched the screen as Spencer routed to a folder on the external hard drive to access child
6 pornography, which we then viewed.

7 17. During the same visit, I watched as Spencer navigated to a "dark web" site called
8 Boytraders, accessed links containing child pornography, and downloaded the child pornography to the
9 Transcend external hard drive.

10 18. A few days after I left Spencer's house, Spencer asked me via Kik whether I had
11 memorized the encryption password yet. I said yes and that it had been easy to memorize. Spencer then
12 commented that he had made his encryption password easier to remember by incorporating the name of
13 a boy for whom he claimed to have feelings, in a format similar to the encryption password he had
14 created for me.

15 19. At some point after Spencer gave me the external hard drive, he told me that it contained
16 one-quarter to one-third of his child pornography collection.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct to the best of my knowledge.

19 Executed on this 18th day of September, 2017, in San Francisco California.

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22 BRYAN PETERSEN
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